

EXHIBIT A

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(Citi's Productions)

- All documents previously produced to the DOJ.
- All communications between Citi and the DOJ concerning the FX investigation.
- All communications between Citi and the FCA concerning Ramchandani.
- All documents exchanged between the parties in the UK Employment Litigation.
 - Date range collected: August 1, 2013 – January 31, 2014
 - Custodians: Michael Corbat, Jeffrey Feig, James Forese, Jeffrey French, Elaine Mandelbaum, Anil Prasad, Danielle Romero-Apsilos, Edward Skyler, Rohan Weerasinghe, and Paco Ybarra (among others)
 - Search terms applied include: ("Rohan" or "Ramchandani") and ("Suspen*" OR "Dismiss" OR "Terminat*" OR "Comp*" OR "Remuneration" OR "Bonus" OR "Forfeit" OR "Shares" OR "Award" OR "Unvested")
- The documents of seven custodians described in Defendants' December 17, 2021 letter.
 - Date range applied: June 1, 2013 – October 26, 2018
 - Custodians: Paul Ferguson, Jeffrey Feig, Jeffrey French, Danielle Romero-Apsilos, Lev Dassin, Jonathan Kolodner, and Mark Nelson¹
 - Search terms applied include: FX or "foreign exchange" or Forex* or DOJ or "Department of Justice" or FCA or "Financial Conduct Authority" or "dream team" or (team w/2 dream) or Antitrust* or Plea* or Guilty* or Ashton* or Mafia or Cartel or Rohan* or Ramchandani* or Chat* or Usher* or Gardiner* or "Dep't of Justice" or "Dept of Justice" or WMR /3 fix or (ECB or "European Central Bank") /3 fix* or Bandits or (Band* /2 Club) or ("one team" /2 "one dream")
- Additional documents reflecting further review of James Forese, Michael Corbat and Paco Ybarra's documents collected for the UK Employment Litigation.
 - Date range collected: August 1, 2013 – January 31, 2014
 - Search terms applied include: FX or "foreign exchange" or Forex* or DOJ or "Department of Justice" or FCA or "Financial Conduct Authority" or "dream team" or (team w/2 dream) or Antitrust* or Plea* or Guilty* or Ashton* or Mafia or Cartel or Rohan* or Ramchandani* or Chat* or Usher* or Gardiner* or "Dep't of Justice" or "Dept of Justice" or WMR /3 fix or (ECB or "European Central Bank") /3 fix* or Bandits or (Band* /2 Club) or ("one team" /2 "one dream")
- Additional documents reflecting further review of Ramchandani's documents collected from January 1, 2013 through January 10, 2014.
 - Search terms applied include: FX or "foreign exchange" or Forex* or DOJ or "Department of Justice" or FCA or "Financial Conduct Authority" or "dream team" or (team w/2 dream) or Antitrust* or Plea* or Guilty* or Ashton* or Mafia or Cartel or Rohan* or Ramchandani* or Chat* or Usher* or Gardiner* or "Dep't of Justice" or "Dept of Justice" or WMR /3 fix or (ECB or "European Central Bank") /3 fix* or Bandits or (Band* /2 Club) or ("one team" /2 "one dream")

¹ Plaintiff's proposed in-house attorney custodians (Mei Lin Kwan-Gett and Elaine Mandelbaum) were also among custodians collected to make Defendants' DOJ communications productions but any of their communications were duplicative of those communications already captured in the production of Citi's outside counsel (Cleary Gottlieb) custodian collections as described in Citi's December 17, 2021 letter.